

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

NO. 04-10020-RWZ

UNITED STATES OF AMERICA

v.

MICHAEL HOWARD,  
Defendant.

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MOTION TO POSTPONE SELF-SURRENDER DATE

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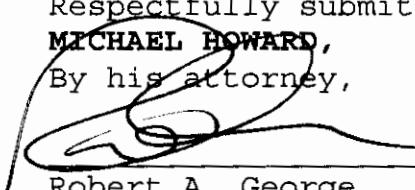
Now comes the defendant Michael Howard, who has been sentenced by this Court on June 2, 2005 with a judicial recommendation that the sentence be served at FCI/Nellis in Las Vegas, Nevada, and moves this Honorable Court to extend the date for reporting to the Bureau of Prisons to begin his sentence until September 13, 2005 for the following good reasons:

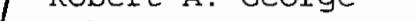
1. The defendant had been notified, through counsel, that he would serve his sentence at FPC/Nellis on June 28, 2005;
2. Counsel had been advised of this fact by telephone by Stacey (LNU) of the United States Marshal's Office in Boston, Massachusetts;
3. As a result, the defendant made arrangements for his wife to reside in Law Vegas at their home during the pendency of his sentence, which is twenty (20) minutes from FPC/Nellis;
4. On July 27, 2005, counsel was advised by the Ms. Graham (FNU) of FPC/Nellis that because the

Nellis facility was closing in January, 2006, plans had changed and that the defendant would report instead to CI/Taft in Taft, California, which is five (5) hours from Las Vegas, Nevada;

5. As a result, Mrs. Howard must now attempt to make living arrangements in or near Taft, California, which necessitates this motion for an extension of time to report to begin the sentence imposed by this Court;
6. For the Court's information, no correspondence or paperwork has been received by either counsel or the defendant memorializing this reporting location or any guidelines or requirements for the event.
7. This motion is not meant to be dilatory and is necessary to prepare for incarceration in a family which has not ever experienced an experience of this type and is attempting to prepare for it as best they can.

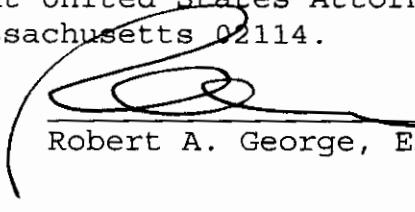
Respectfully submitted,

  
MICHAEL HOWARD,  
By his attorney,

  
Robert A. George  
Robert A. George, Esquire  
BBO # 189400  
Robert A. George &  
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Boston, MA 02116  
617.262.6900

CERTIFICATE OF SERVICE

I, Robert A. George, do hereby certify that I have served a copy of the foregoing Motion to Postpone Self-Surrender Date via hand delivery, on August 2, 2005, on Jonathan Mitchell, Assistant United States Attorney, One Courthouse Way, Boston, Massachusetts 02114.

  
Robert A. George, Esquire